

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EARLANDO SAMUEL,

Plaintiff,

CIVIL ACTION NO. 20-337-CFC

v.

NEW CASTLE COUNTY
HOUSING AUTHORITY,
et al,

Defendants

2021 MAY 27 PM 2:48

U.S. DISTRICT COURT
DISTRICT OF DELAWARE
KMD

PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff EARLANDO SAMUEL respectfully moves the Court for leave to file a Amended Complaint. Rule 15 provides that "a party may amend its pleading [with] the court's leave" and that "[t]he court should freely give leave when justice so requires." Fed. R. Civ. P. 15(a)(2).

Allowing Plaintiff to file the Amended Complaint would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility. Through the Amended Complaint, Plaintiffs seek to add three new Defendants—one respondeat superior, Ingerman Property Management, 5 Powell Lane, Collingswood, N.J., 08108, 856 662 1730 and two individuals and employees, Rashida Smith, General Manager of Ingerman Birchwood at Rodney Court, 1100 Pennsylvania Ave., Wilmington, Delaware, 19806, which is regulated by the defendant New Castle County Housing Authority, and RyAnn Williams, Assistant Manager of Ingerman Birchwood at Concord, 452 Parker Place, Glen Mills, Pennsylvania, 19342..

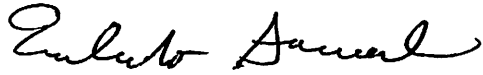
Further, Plaintiffs seek to allege new counts based on the conduct and practices uncovered by Plaintiff since the original Complaint and modification of the Prayer For Relief.

(Prayer For Relief

6. If this Court has to power to make changes to The Code Of Federal Regulations, Title 24, Subtitle B - Regulations Relating to Housing and Urban Development, CHAPTER VIII - OFFICE OF THE ASSISTANT SECRETARY FOR HOUSING-FEDERAL HOUSING COMMISSIONER, DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (SECTION 8 HOUSING ASSISTANCE PROGRAMS, SECTION 202 DIRECT LOAN PROGRAM, SECTION 202 SUPPORTIVE HOUSING FOR THE ELDERLY PROGRAM AND SECTION 811 SUPPORTIVE HOUSING FOR PERSONS WITH DISABILITIES PROGRAM) (Parts 800-810 - 892-899), I request additions that the property owners that rent their properties through these Federal programs and employee's of the State Housing Authority's be held to the same standards as the tenants when it comes to criminal background checks. I have firsthand knowledge of wrongdoings such as arson, fraud, etc. I have even rented from a convicted sex offender/child molester. National criminal background checks for the property owners and the LLC's that do business in regards to the Federal housing programs. Some have properties in one State while living in another.)

For all the above reasons Plaintiff respectfully request that the Court grant Plaintiff leave to file the Amended Complaint.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Earlando Samuel".

Earlando Samuel, pro se
207 Parker Place
Glen Mills, PA., 19342
610 241 7537
easee2@gmail.com

Dated: May 27, 2021

cc/file

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CERTIFICATE OF SERVICE

I certify that, on the date set forth below, the foregoing PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT was on the date set forth below was served on Defendants New Castle Housing Authority, et al, attorney Mengteng Chin of the New Castle County Office Of Law by First Class Mail at its registered office at the New Castle County Government Center, 87 Reads Way, New Castle, DE 19720.

Dated: May 27, 2021.

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I certify that, on the date set forth below, the foregoing PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT was on the date set forth below was served on Defendants GreenLawn Group, LLC, et al, attorney William R. Adams by First Class Mail at its registered office of DICKIE, MCCAMEY & CHILCOTE, P.C., 222 Delaware Avenue, Suite 1040, Wilmington, DE 19801.

Dated: May 27, 2021.

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I certify that, on the date set forth below, the foregoing PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT was on the date set forth below was served on Defendant Fairville Management Company, LLC attorney **Krista M. Reale** of Margolis Edelstein, 300 Delaware Avenue, Suite 800, Wilmington, DE 19806 by First Class Mail at its registered office of DICKIE, MCCAMEY & CHILCOTE, P.C., 222 Delaware Avenue, Suite 1040, Wilmington, DE 19801.

Dated: May 27, 2021.

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